

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL COLLECTION
AGENCY, INC., CUSTOMER DATA
SECURITY BREACH LITIGATION

This Document Relates To: All Actions

Civil No. 2:19-md-02904
(MCA)(MAH)

Magistrate Judge Michael A. Hammer

[PROPOSED] AMENDED SCHEDULING ORDER

WHEREAS, on October 15, 2024, the Court entered an MDL Text Order (ECF Doc. 736) establishing service and filing deadlines pertaining to class certification;

WHEREAS, on November 25, 2024, the Court entered an Amended Scheduling Order (ECF Doc. 746) extending all class certification deadlines as agreed to by all parties;

WHEREAS, on July 2, 2025, the Court entered the Parties' Joint Stipulation and Order Regarding Withdrawal of Plaintiffs' Expert Designation of Gary D. Olsen (ECF Doc. 769), which reset Defendants' class certification response briefs and related expert reports to be due 30 days after the date of the last deposition of Plaintiffs' experts;

WHEREAS, the last deposition of Plaintiffs' experts referred to in the Joint Stipulation has been scheduled for July 31, 2025;

WHEREAS, if all depositions of Plaintiffs' experts are completed by July 31, 2025, as scheduled, the Parties agree that the deadlines specified in the proposed schedule below are reasonable and appropriate; and

Good cause appearing,

IT IS this _____ day of _____, 2025,

ORDERED that the following are the operative deadlines for the events set forth below:

MICHAEL A. HAMMER, U.S.M.J.

Event	Date
Defendants to serve briefs in opposition to class certification and any expert reports in opposition to class certification	September 2, 2025
Defendants to make any experts available for deposition, unless Plaintiffs agree to a later date	October 2, 2025
Plaintiffs to serve reply briefs in support of class certification and any rebuttal expert reports in support of class certification	October 22, 2025
All parties to serve any motions challenging class certification experts	November 10, 2025
All parties to serve briefs in opposition to motions challenging class certification experts	December 3, 2025
All parties to serve reply briefs in support of motions challenging class certification experts	December 17, 2025
Plaintiffs to file motions for class certification	December 18, 2025
Defendants to file briefs in opposition to class certification	December 19, 2025
Plaintiffs to file reply briefs in support of class certification	December 22, 2025
All parties to file motions challenging class certification experts	December 23, 2025
All parties to file briefs in opposition to motions challenging class certification experts	December 29, 2025
All parties to file reply briefs in support of motions challenging class certification experts	December 30, 2025